

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

AMAZON.COM, INC., a Delaware corporation; AMAZON.COM SERVICES LLC, a Delaware limited liability company; and AMAZON TECHNOLOGIES, INC., a Nevada Corporation,

Plaintiffs,

v.

DIGITAL HOME SOLUTIONS LLC, a Georgia corporation; JOTI APPLÉE DHILLON, an individual; and DOES 1-50, unknown individuals and entities,

Defendants.

Civil Action No.: 1:23-cv-5175-ELR

**JOINT MOTION TO DISMISS
REMAINING CLAIMS WITH
PREJUDICE**

JOINT MOTION TO DISMISS REMAINING CLAIMS WITH PREJUDICE

Plaintiffs Amazon.com, Inc., Amazon.com Services LLC, and Amazon Technologies, Inc., and Defendants Digital Home Solutions LLC and Joti Applee Dhillon, by and through their respective counsel of record, hereby move the Court to dismiss the remaining claims with prejudice:

1. The Court has previously entered a Permanent Injunction enjoining Defendants Digital Home Solutions LLC and Joti Applee Dhillon from engaging in certain conduct that infringes upon Plaintiffs' trademarks.

2. Pursuant to Fed. R. Civ. P. 41(a)(2), this action and all claims in this action are hereby dismissed with prejudice and without fees or costs to either side.

3. The Court shall retain continuing jurisdiction over this matter for the limited purposes of enforcing the terms of the parties' Settlement Agreement and Permanent Injunction.

Respectfully submitted this 22nd day of March, 2024.

DAVIS WRIGHT TREMAINE LLP

/s/ Jaime Drozd

Bonnie E. MacNaughton*

Jaime Drozd*

920 Fifth Avenue, Suite 3300

Seattle, WA 98104

Phone: (206) 622-3150

Fax: (206) 757-7700

bonniemacnaughton@dwt.com

jaimedrozd@dwt.com

**pro hac vice*

ROBBINS ALLOY BELINFANTE

LITTLEFIELD LLC

/s/ Craig G. Kunkes

Craig G. Kunkes

Georgia Bar No. 963594

Michael D. Forrest

Georgia Bar No. 974300

500 14th Street, NW

Atlanta, Georgia 30318

Phone: (678) 701-9381

ckunkes@robbinsfirm.com

mforrest@robbinsfirm.com

Attorneys for Plaintiffs

LEXERO LLC

/s/ Eric Menhart

(with express permission)

Eric Menhart*

512 C. St. NE

Washington, DC 20002

Phone: (855) 453-9376

Fax: (855) 453-9376

eric.menhart@lexero.com

**pro hac vice forthcoming*

Attorney for Defendants

ORDER

IT IS SO ORDERED.

DATED THIS ____ day of _____, 2024.

The Honorable Eleanor L. Ross
United State District Court,
Northern District of Georgia